

REMARKS

In response to the final Official Action of February 18, 2009 and the Advisory Action of April 30, 2009, claims 1, 12, 21, and 29 have been amended in a manner which is believed to particularly point out and distinctly claim the invention. Support for the amendment to these independent claims is found in the original application as filed, including Figures 2a-2c and 3 and the accompanying description in the specification, including page 12, line 18 through page 16, line 25. No new matter is added.

Claim Rejections - 35 USC §102

At section 2, claims 1-29¹ are rejected under 35 USC §102(e) as being unpatentable in view of US patent application publication 2004/0021691, Dostie, et al (hereinafter Dostie).

As set out on pages 2-3 of the Office Action, the Office asserts that Dostie discloses a second set of characters of a character set with specific reference to Figure 3 and highlighted characters "TYSD". The Office also asserts that Dostie discloses a first set of characters where the characters in the first set of characters are statistically more likely to be selected in successive order than the characters in the second set of characters independently of user input. The Office asserts that this is shown by paragraphs [0138], including "default view upon system start up is an English character set laid out on a keyboard" (final Office Action page 2, lines 20-21). It is applicant's attorney's understanding that the Office asserts that the characters displayed in Figure 3 in what is called the "character entry mode" is an overall digital keyboard 28a and that the characters as displayed therein are statistically more likely to be selected in successive order than the characters in the second set of characters independently of user input. Applicant's attorney understands the first set of characters to be the characters in digital display 28a. It is to this understanding of the position of the Office that applicant has

¹ At section 2, dependent claims 6, 17, and 25 are noted as being rejected as anticipated by Dostie, but at page 4 of the final Office Action, the Office notes that Dostie does not specifically mention the details of these claims. It is therefore apparent that the rejection of these claims is based on 35 USC §103 as set forth at section 6 of the Action.

provided further amendment to the independent claims of the present application to clearly distinguish the present invention over Dostie.

Brief Summary of Applicant's Invention

The following summary is provided with respect to applicant's invention. This summary is provided to assist the Office in understanding the nature of the present invention.

Thus, it is apparent in Figures 2a-2c and 3 of the present application that the present invention is directed toward increasing the probability of obtaining correct user input on a touch screen. This problem is solved by reducing the number of characters on the displayed keyboard and thereby allowing the size of the displayed characters to be increased on the display. The number of displayed characters is reduced by dividing the alphanumeric characters of the keyboard into at least two non-overlapping sets of characters of a character set. This is clearly seen in Figures 2a-2c where the character set is divided into two different sets of characters, such as sets of characters 202 and 203 shown in Figure 2a, sets of characters 212 and 213 shown in Figure 2b, and sets of characters 222 and 223 shown in Figure 2c. This problem and solution is not discussed or suggested in Dostie. Although Dostie discloses so-called completion candidates when in its described "rapid search mode" (such as the characters "TYSD" shown in Figure 3 of Dostie by highlighting such characters), Dostie does not in any way address the problem of dividing a character set into at least two sets of characters where the first set of characters are statistically more likely to be selected in successive order than the characters in the second set of characters.

In this regard, the independent claims of the present application have been amended to particularly point out and distinctly claim that the character set contains a first set of characters comprising at least two alphanumeric characters and a second set of characters of the same character set that also comprises at least two alphanumeric characters. Furthermore, the independent claims have been amended to particularly point out that the alphanumeric characters of the first set of characters and the alphanumeric characters of the second set of characters are mutually exclusive. This is

clearly seen by the alphanumeric characters of the set of characters shown in Figures 2a-2b.

Furthermore, the independent claims have been amended to point out that the display is configured to selectively display, for selection of which characters to input, either the first set of characters or the second set of characters. This again is also clearly shown in the application as filed where only one set of characters, such as set of characters 222 or set of characters 223, is displayed on display 102 (shown in Figure 1).

Argument

The Office continues to state in the Advisory Action that Dostie in paragraphs [0138] and [0198] teaches a default view, graphical keyboard, displayed on the screen upon start of the application thus no user input has taken place (Advisory Action, page 2). Paragraph [0138] of Dostie explicitly teaches "By default, data entry system 26 begins in character entry mode, with the digital keyboard 28a displayed." Thus, applicant acknowledges that Dostie at paragraph [0138] and Figure 3 teaches a data entry system which by default begins in a character entry mode wherein upon start up an ordinary QWERTY keyboard is displayed.

The Office further states in the Advisory Action "Then the first set of characters is displayed without user input." It is apparent that the Office deems the first set of characters displayed upon start up to be equivalent to the first set of characters of claim 1 of the present application.

The Office further states in the Advisory Action that Dostie discloses a user input mechanism to obtain a display of the second set of characters which, as noted above, correspond, for example, to the highlighted characters "TYSD" shown in Figure 3 of Dostie. Thus, it is apparent that the second set of characters is a subset of the first set of characters and further it is clear that the characters in both the first set of characters and the second set of characters are displayed in Figure 3 of Dostie at the same time. There is no selective displaying of the characters in the first set of characters or the characters in the second set of characters.

It is noted that Dostie does not select or even relate the characters in the first or second set of characters with a probability to be selected in successive order. Particularly, Dostie does not disclose or suggest the feature of amended claim 1 wherein a comparison between the first and second set of characters in terms of the first set of characters being statistically more likely to be selected in successive order than the characters in the second set of characters is required. In this regard, the candidates of the set of characters of Dostie deemed by the Office to be the second set of characters is based on a previous input character selected by a user. Thus, depending on the previous input character, the second set of characters (such as the highlighted TYSD shown in Figure 3) will take on different members.

In order to emphasize the distinguishing features of the present invention as claimed, the independent claims of the present invention have been amended to disclose that the characters in the first set of characters and the second set of characters comprise alphanumeric characters of a character set and further that the alphanumeric characters of the second set of characters are mutually exclusive from the alphanumeric characters in the first set of characters, as is clearly apparent in Figures 2a, 2b, 2c, and 3 of the present application. This feature is not disclosed or suggested by Dostie.

As stated earlier, the second set of characters according to Dostie is a subset of the first set of characters and therefore Dostie does not disclose mutually exclusive alphanumeric characters. Furthermore, by associating a QWERTY keyboard with a first set of characters, a second set of characters being mutually exclusive with the first set of characters would thereby comprise zero alphanumeric characters which, of course, is meaningless. In contrast, according to the present amended independent claims, each set of characters comprise at least two alphanumeric characters.

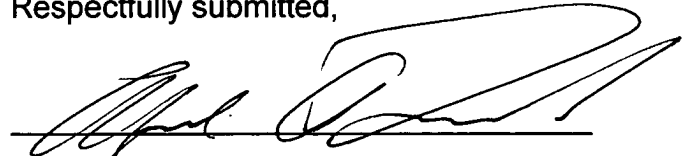
For all of the foregoing reasons, it is therefore respectfully submitted that independent claims 1, 12, 21, and 29 are not disclosed or suggested by Dostie.

Since each of the independent claims are distinguished over Dostie, it is respectfully submitted that the dependent claims of the present application are further distinguished over Dostie at least in view of such dependency, whether Dostie is taken

alone or in combination with US patent 7,152,213, Pu, et al, as argued by the Office at section 6 of the Action.

In view of the foregoing, it is respectfully submitted that the present application as amended is in condition for allowance and such action is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Alfred A. Fressola', is written over a horizontal line.

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